

Incident Action Plan (IAP)

For the

Atlantic Relocation Systems Oil Spill

For Operational Period:
4/2/15: 0700 Hours to
4/9/15: 0700 Hours

1.0 Incident Action Plan

This Incident Action Plan (IAP) is intended to guide oil removal actions in response to the Atlantic Relocation Systems Oil Spill. The location of the oil discharge removal action is 9967 Westpoint Drive, Indianapolis, Indiana (Onsite), and all areas affected downstream (Offsite). IAPs are written for a specific operational period (range of dates/times). A new IAP will be issued for subsequent operational periods until emergency actions are determined to be complete by the Federal On-Scene Coordinator (OSC) of the U.S. Environmental Protection Agency in consultation with other regulatory agencies with authority over this incident. The OSC for this incident is Jason Sewell, sewell.jason@epa.gov, 317-517-6987 (mobile).

2.0 Background

On 3/11/15, Fishers Fire Department (FFD) responded to an oil discharge at a storm water retention basin at Crosspoint business park located behind/north of 7988 Westpoint Drive, Indianapolis, Indiana. FFD also deployed oil response materials in downstream waters, including Cheeney Creek. Additional local agencies responded to the oil spill, including Hamilton County Emergency Management Agency (EMA), Hamilton County Surveyor's Department, and Fishers Municipal Separate Storm Sewer authority (MS4). The Indiana Department of Environmental Management (IDEM) responded 3/11/15 and mobilized BEST Environmental, a spill response contractor, to begin oil containment and removal operations. IDEM and Fishers MS4 located an oil discharge from the 8000 gallon diesel above ground storage tank (AST) at the operating address for Atlantic Relocation Systems located at 9967 Westpoint Drive, Indianapolis, Indiana.

On 3/12/15, Atlantic Relocation Systems (Atlantic) mobilized Environmental Restoration (ER) to begin onsite cleanup at 9967 Westpoint Drive. IDEM/BEST continued offsite cleanup.

On 3/13/15, Atlantic assumed all onsite and offsite cleanup actions. Atlantic's contractor, ER, assumed primary contracting role and sub-contracted IDEM's contractor, BEST Environmental, to continue cooperative cleanup efforts. The EPA OSC and the EPA authorized Superfund Technical Assessment and

Response Team (START) contractor Quality Environmental Professions Inc. (QEPI) responded to assist with ambient air monitoring, sampling and oversight.

Beginning 3/14/15, Atlantic's contractors continue to remove oil with oversight by the OSC and START.

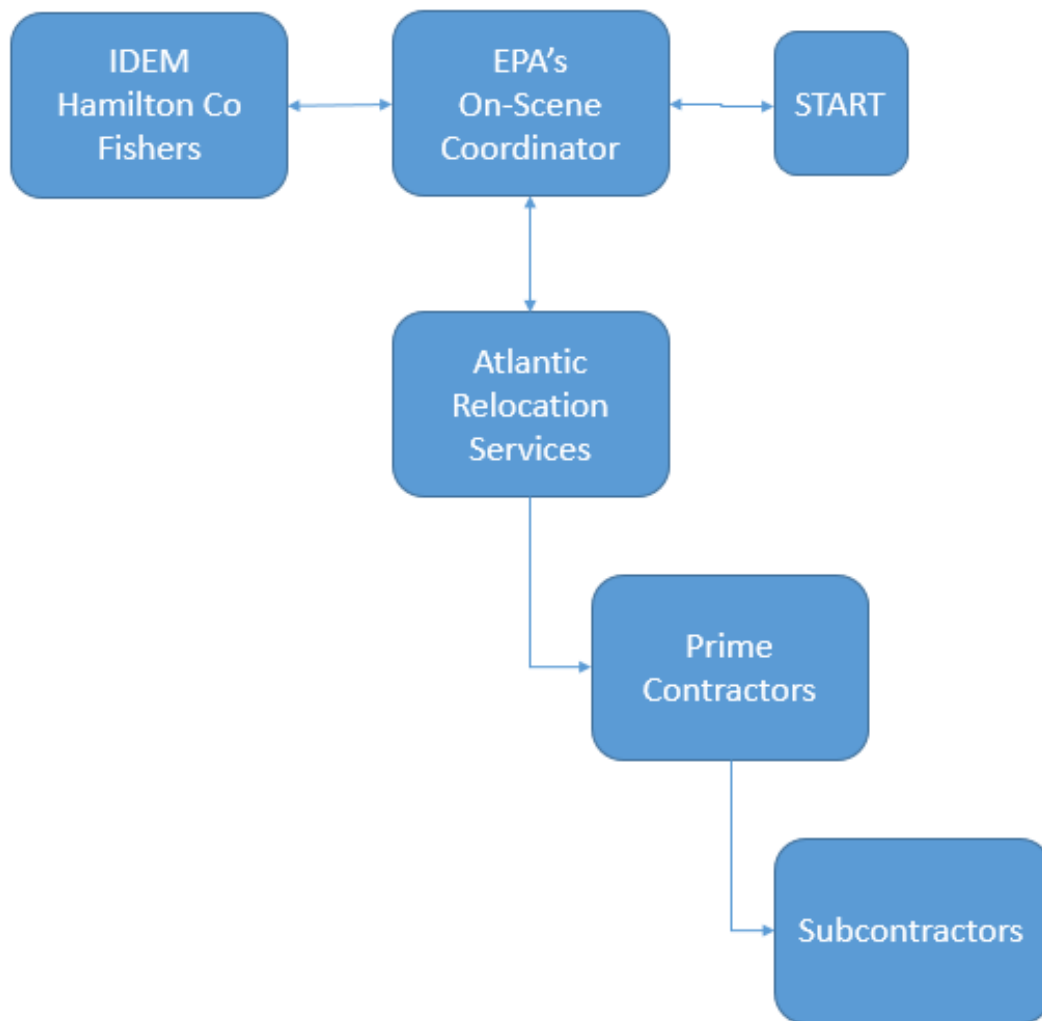
3.0 Regulating Authorities and Response Organizational Structure

3.1 – Responding Agencies - There are multiple agencies with authority over this discharge and cleanup of oil. The direct participation of agencies may change on a daily basis; participation of agencies in this response structure has no bearing on their authority to regulate the discharge or cleanup of oil. Agencies should be added as they become known; agencies include but may not be limited to:

- U.S. EPA Region 5
- IDEM
- Indiana Department of Natural Resources
- U.S. Fish and Wildlife
- Fishers Fire Department
- Fishers MS4
- Hamilton County Surveyor
- Hamilton County Emergency Management Agency
- Hamilton County Health Department

3.2 Response Organizational Structure – The organizational structure of the response may include Responding Agencies, authorized government contractors, Atlantic Relocation Systems representatives, and spill response contractors. The direct participation of Responding Agencies may change on a daily basis depending on the nature of the oil discharge response.

The organizational structure may change, but a structure will remain in place until determined by the OSC but generally after emergency response and cleanup objectives have been met. The following illustration can be used as a guide but does not preclude changes that occur between revisions of the IAP:

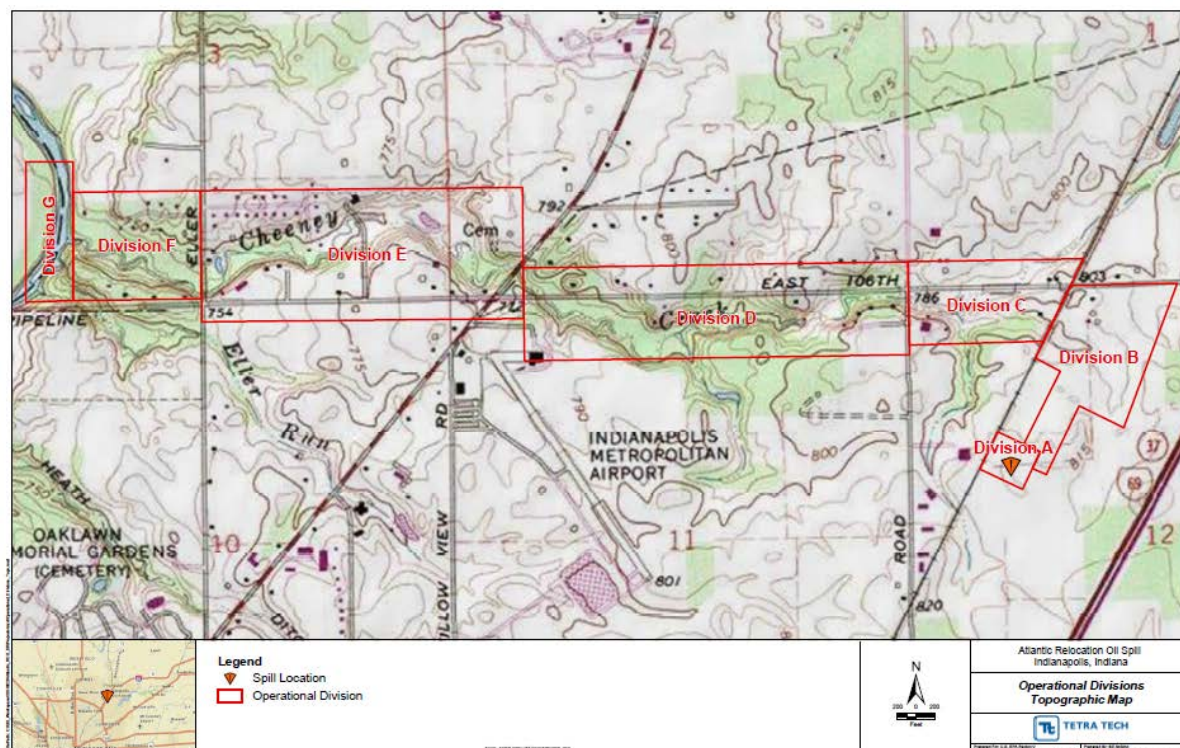


4.0 Potentially Affected Properties and Geographical Response Areas

There are multiple properties potentially affected by this discharge of oil. Potentially affected properties may include the Crosspoint business park, other offsite commercial properties, Ritchey Woods Nature Preserve, several dozen residential properties, and possibly other unidentified properties. A map of affected areas is being drafted by START. Affected areas are being divided into geographical divisions. Response planning and cleanup progress will be established and tracked by these divisions.

The following geographical response areas are established, divisions may be added or subdivided as necessary:

- Division A – All oil affected areas at the 9967 Westpoint property (Onsite)
- Division B1 – Beginning downstream of Division A, includes oil affected areas (storm water basin)
- Division B2 – Wetland Cattails inlet to where the basin discharges under railroad tracks
- Division C – Beginning at Division B, includes oil affected areas from railroad tracks to Hague Road
- Division D – Beginning at Division C, includes oil affected areas from Hague Road to Cheeney Creek culvert under 106th Street.
- Division E – Beginning at Division D, includes oil affected areas (Cheeney Creek) from 106th Street to Eller Road
- Division F – Beginning at Division E, includes oil affected areas (Cheeney Creek) from Eller Road to White River
- Division G – White River



5.0 Incident Objectives

The following objectives are established for the Atlantic Relocation Systems Oil Spill response:

- Response actions will be performed in manner protective of site workers and the general public.
- Actions will be taken as necessary to prevent the further discharge of oil.
- Actions will be taken as necessary to contain the further movement/migration of discharged oil, including the prevention of oil from entering the West Fork of White River. Actions may include removal of oil, oily water, and oil soaked debris, soil, and vegetation.
- Other objectives may be identified and included in subsequent IAPs.

6.0 Planning and Reporting of Progress (To be completed by Response Manager)

This section is for:

- 6.1 Planned response activities over the following operational period; Projected response activities before the end of the response;
- 6.2 Other issues affecting response operations;
- 6.3 Weather forecast and impacts on response.

6.1 Planned Response Activities

Thursday 4-2-2015

Site operations are scheduled for a 24-hour shift, starting at 0700 Hours to include 13 Environmental Restoration (ER) employees 0700-1900 and tentatively scheduled rain event night crew starting at 1900-0700 to include 3 Environmental Restoration (ER) employees and 2 Best Environmental subcontractors with a Vacuum Truck.

Friday 4-3-15

Site operations are scheduled for a 12-hour day shift, starting at 0700 Hours to include 13 Environmental Restoration (ER) employees and 2 Best Environmental subcontractor with a Vacuum Truck (to complete tentatively scheduled rain event).

No night operations planned, night shift will resume on an as needed basis, dependent upon weather projections, current site conditions and if circumstances warrant.

Saturday 4-4-2015 & Sunday 4-5-2015

Site operations are scheduled for a 10-hour day shift each day, starting at 0700 Hours to include 6 Environmental Restoration (ER) employees and Best Environmental subcontractor staging a Vacuum Truck onsite, as a contingency, with operator(s) on call.

No night operations planned, night shift will resume on an as needed basis, dependent upon weather projections, current site conditions and if circumstances warrant.

Monday 4-6-2015 through Wednesday 4-8-15

Site operations are scheduled for a 12-hour day shift each day, starting at 0700 Hours to include 13 Environmental Restoration (ER) employees and Best Environmental subcontractor staging a Vacuum Truck onsite, as a contingency, with operator(s) on call.

No night operations planned, night shift will resume on an as needed basis, dependent upon weather projections, current site conditions and if circumstances warrant.

Division A

Catch Basin Observation on #1, #2, #3 (all have plug inserted on downstream) and Boom Maintenance Monitoring on #4.

Continue 8,000 gallon AST Containment Observation and Monitoring.

ERM, upon receipt, to report Division A sub-surface investigation sampling results conducted March 24, 2015 through March 27, 2015 and Biological Field Analysis performed March 31, 2015 (all divisions).

Division B1

Storm Water Basin Observation and Boom Maintenance Monitoring.

Continue to obtain written access agreement, awaiting a response from Tetra Tech, Ms. Jill Best, DTZ Property representative.

Division B2

Storm Water Basin discharge station to the inlet and the discharge of the Cattails area to perform observation and maintenance of the boom, and sweep absorbent.

Continue to obtain written access agreement, awaiting response from Norfolk Southern application/permit process, upon access authorization initial recon to be performed through the wetland/cattails area to determine necessary scope of work.

Division C

Continue boom and sweep maintenance in the retention pond and Cheeney Creek.

Continue to obtain written access agreements.

Collect any impacted residual petroleum (non-organic) vegetation, branches, debris along the banks.

Division D

Continue boom and sweep maintenance from Hague Road to Allisonville Road.

Collect any impacted residual petroleum (non-organic) vegetation, branches, debris along the banks & clear impacted log jams areas throughout Ritchey Woods Nature Preserve and further west in Division.

Continue to obtain written access agreements.

Division E

Continue boom and sweep absorbent maintenance, Allisonville Road Bridge area to Eller Road.

Collect any impacted residual petroleum (non-organic) vegetation, branches, debris along the banks.

Continue to obtain written access agreements.

Division F

Continue boom and sweep absorbent maintenance, Eller road to White River.

Collect any impacted residual petroleum (non-organic) vegetation, branches, debris along the banks, downstream end of Division F will be performed utilizing an ER 14' Jon Boat.

Continue to obtain written access agreements.

Division G

No planned operations on the White River other than visual observation from the banks of the Cheeney Creek inlet of the White River.

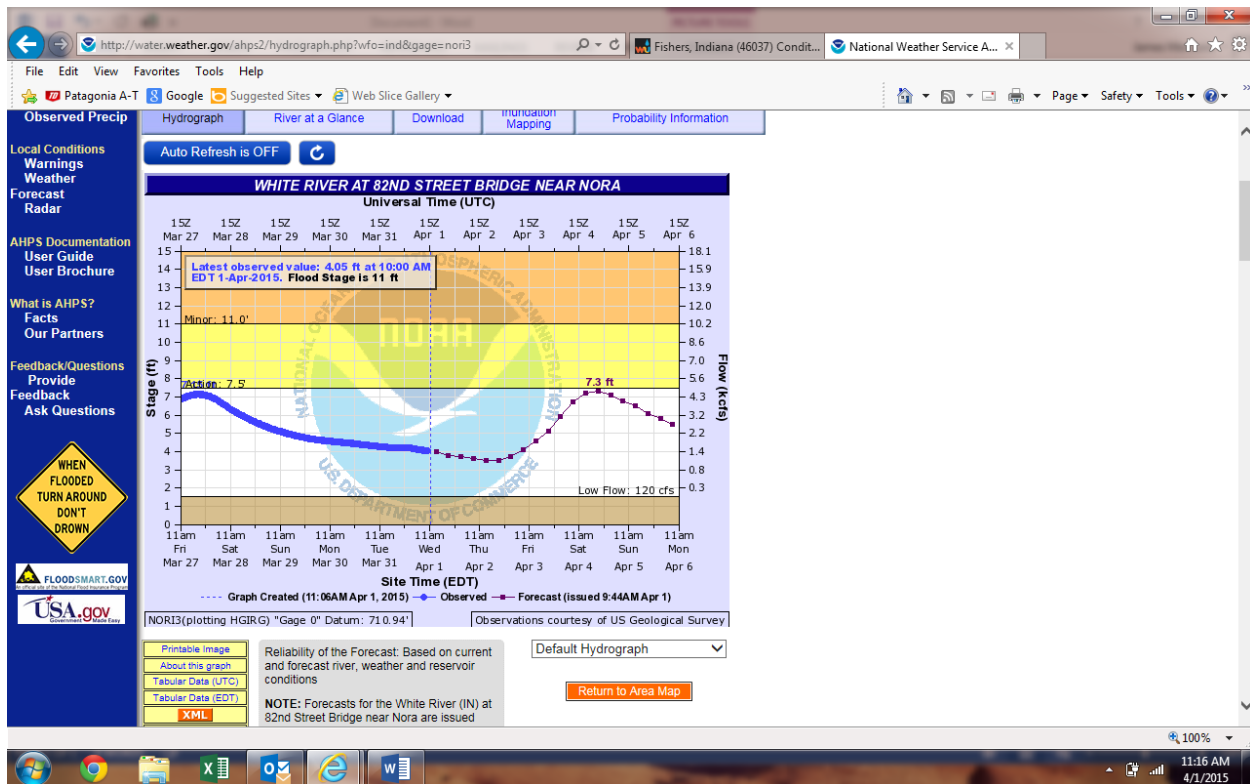
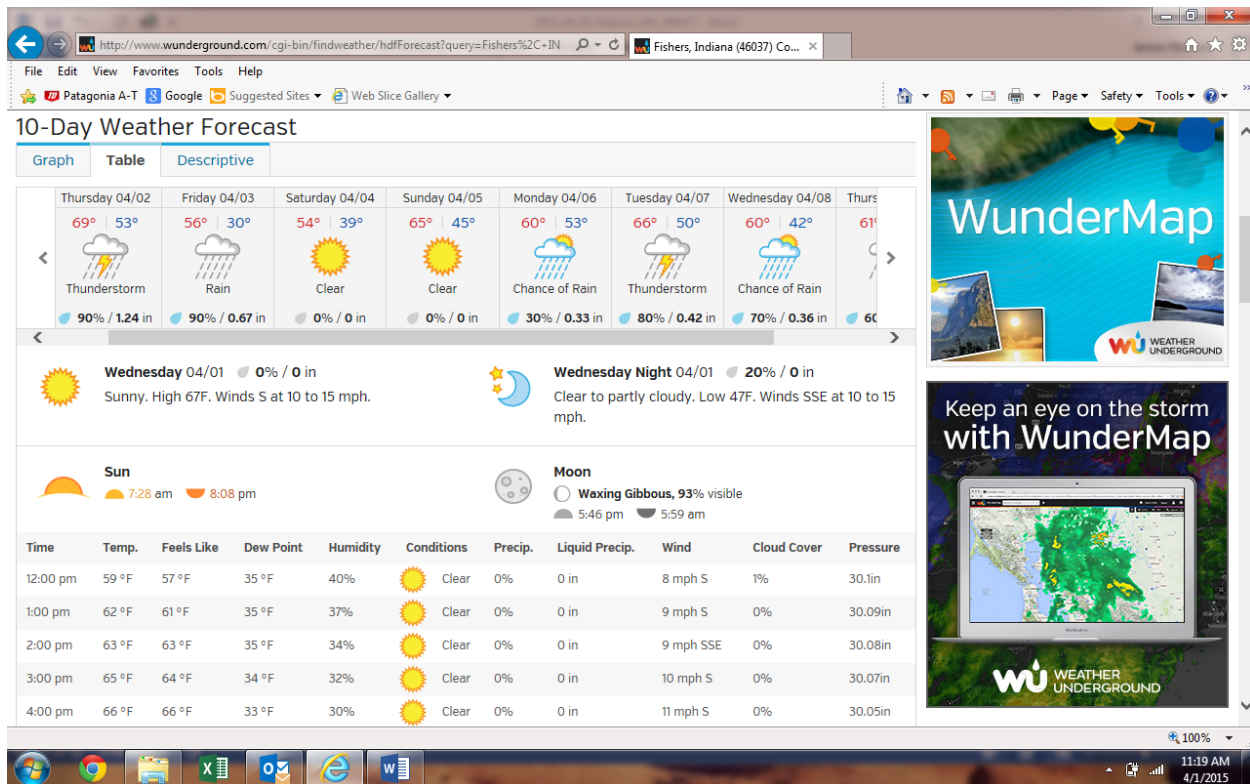
6.2 Other Issues

The possibility of non-obtainment to Access Agreement Authorization could affect the projected response operations, specifically Division B2. Standby status for Sub Contractor Best Environmental, weather watch and heavy petroleum impacted collection areas would result in a call-in activation.

6.3 Weather

Weather forecasted for Thursday 4-2-2015 thunderstorm (90%) with 1.24" projected, into the high 60's; Friday 4-3-2015 rain (90%) with 0.67" projected, into the mid 50's; Saturday 4-4-2015 projected clear, into the mid 50's; Sunday 4-5-2015 projected clear, into the mid 60's; Monday 4-6-2015 chance of rain (30%) with 0.33" projected, into the low 60's; Tuesday 4-7-2015 thunderstorm (80%) with 0.42" projected, into the mid 60's and Wednesday 4-8-2015 chance of rain (70%) with 0.36" projected, into the low 60's.

Water levels are projected to slightly recede early in the period followed by a rise to flood stage action levels at 7.3' throughout the Divisions and within the White River, projecting workable response operation conditions, but requiring standby status for water level watch with projected activities and contingency plans.



Contact Information

Authorized agency and company contact information, info can be added/removed as necessary:

Affiliation/Role	Contact	Email	Mobile Phone Number
U.S. EPA/OSC	Jason Sewell	Sewell.jason@epa.gov	Not responsive
IDEM/State OSC	David Cage	dcage@idem.in.gov	Not responsive
Atlantic Relocation	Jon Schroeder, President	Jon.Schroeder@atlanticrelocation.com	Not responsive
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START	Josh Randall	jrandall@gepi.com	Not responsive
Hamilton County Health Department	Jason LeMaster	jason.lemaster@hamiltoncounty.in.gov	Not responsive
Hamilton County Surveyors Office	Kenton Ward & Jerry Liston	Kenton.Ward@hamiltoncounty.in.gov Jerry.Liston@hamiltoncounty.in.gov	Not responsive

7.0 Preparation and Approval of Plan

This IAP will be reviewed and approved by the OSC and Atlantic prior to the beginning of the operational period for which it is written. Operational periods will be established by the OSC with consultation from Atlantic. The plan may also be reviewed and approved by other regulating agencies, as necessary.

U.S. EPA _____ Jason Sewell _____ Date _____

Atlantic Relocation Systems Representative: ___Jon Schroeder (by email)_ Date _____

Others _____
